Preliminary EPA Comments - Rolling Knolls Landfill Draft Feasibility Study Section 7 – DETAILED ANALYSIS OF GROUNDWATER REMEDIAL ALTERNATIVES - May 1, 2018

1. **Section 7 general:** The only COCs mentioned in the section are 1,4-dioxane and benzene. The previous draft of the FS Section 4.2.2 had a groundwater COC table that included PAHs, PCBs, CFCs, SVOCs, and metals. This section should be updated to evaluate all groundwater COCs.
2. **Section 7.3 and 7.4 general:** More information should be provided regarding the criteria for deciding if there are additional source areas. If the decision criteria will be included in the PDI, please state so.
3. **Section 7.3, par. 1**: Prior to the start of the second sentence, please add, "Based on existing data, it is assumed that source control will consist of...." We realize that the paragraph goes on to explain that additional source control measures may be needed, but the addition of these words will make the scenario clearer.
4. **Section 7.3 pg 4 par. 1:** The proposed general source control methods of excavation or capping are acceptable.
5. **Section 7.3 pg 4 par. 2:** It should be noted that a more robust groundwater monitoring network will likely be needed to monitor groundwater restoration.
6. **Section 7.3.4 pg 7 bullet 4:** Since this alternative does not utilize treatment technologies, this statement should be revised to reflect that there is no treatment. Please delete "Therefore, it partially satisfies the preference for treatment." and replace with "Therefore it does not satisfy the preference for treatment.".
7. **Section 7.4.1 pg 10 par. 1:** An additional line of evidence that will be evaluated to determine if the contingent remedy will be triggered is the estimated timeline of compliance with ARARs. Example language: Groundwater will be monitored for five years following completion of any soil and source area remediation, and at that point (and along the way) data will be evaluated to determine if COCs are stable or decreasing in magnitude or in aerial extent. An estimated time until compliance should be calculated to determine if the ARARs will be met within a reasonable timeline (30 years). If it is determined that COCs are migrating, increasing in concentration, or will not meet ARARs in a reasonable timeframe, the contingency will be triggered.
8. **Section 7.4.1 pg 10 bullet 2:** Typo – delete "at concentrations" in the first sentence.
9. **Section 7.4.1 pg 10 bullet 2:** More specific metrics for determining whether restoration is occurring, including contingency remedy triggers, may need to be memorialized in the ROD not just in the RD process. See comment 5.
10. **Section 7.4.1 pg 11 par. 3:** It should be noted that a more robust monitoring network will likely be needed for performance measure evaluation. The current monitoring network isn't set up in a way to effectively monitor aerial contaminant footprints/plume stability.
11. **Section 7.4.1 pg 12:** The bulleted list of considerations for triggering of the contingent remedy is overall good and comprehensive, but timeline for compliance with ARARs should be added as another consideration. See comment 5.
12. **Section 7.4.1 pg 13 table:** The groundwater COC table is significantly reduced from the previous draft (which was in Section 4.2.2). It should be updated to include PAHs, PCBs, SVOCs, CFCs, and metals. The contingency remedy will need to be structured in a way to address any COCs that may not respond to source control measures, so the table should be comprehensive.